

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
                                  )  
                                  )  
Plaintiff,                    )  
                                  )  
                                  )  
vs.                            )                                    CIVIL NO. 18-1683-NJR  
                                  )  
                                  )  
\$510,910.00 IN UNITED STATES )  
CURRENCY, *et al.*,            )  
                                  )  
                                  )  
Defendant.                    )

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

The United States of America, by and through its attorneys, Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and William E. Coonan, Assistant United States Attorney, and Stephen M. Komie, Claimant and attorney for Claimant, and respectfully moves for a protective order pursuant to Federal Rule of Civil Procedure 26(c).

1. Plaintiff United States moves and requests an order to protect certain sensitive government information during the discovery process. Federal Rule of Civil Procedure 26(c) provides the vehicle for such a protection, allowing the court to order restriction on who may access to certain information.

2. The parties anticipated and agree that this matter may require the disclosure of confidential and sensitive documents and material.

3. In this case, DEA seized a large amount of currency, a recreational vehicle, and a firearm from Mr. Patrick Barber. DEA concluded that those items were connected to illegal drug trafficking. Claimants Barber and his attorney Mr. Stephen M. Komie, Esq., seek certain internal documents belonging to DEA (*e.g.*, sensitive policies regarding investigation and handling of evidence). The United States submits that these certain documents are confidential and may

otherwise be not within the scope of discovery or objectionable. In an effort to settle ongoing discovery disputes, the United States has agreed to provide certain documents pursuant to a protective order.

4. A proposed order has been submitted to the Court's proposed documents inbox.
5. Good cause exists for the entry of a protective order under Rule 26(c) and all parties consent to the entry of this proposed order.

Wherefore, the parties respectfully move for and request a protective order as supplied to the Court.

UNITED STATES OF AMERICA

Respectfully submitted,

STEVEN D. WEINHOEFT  
United States Attorney

*s/ William E. Coonan*  
WILLIAM E. COONAN  
Assistant United States Attorney  
Nine Executive Drive  
Fairview Heights, Illinois 62208-1344  
618.628.3700 telephone  
618.622.3810 facsimile  
E-mail: [Liam.Coonan@usdoj.gov](mailto:Liam.Coonan@usdoj.gov)

STEPHEN M. KOMIE, Claimant  
by and through his attorneys  
KOMIE AND ASSOCIATES

By: *s/ Stephen M. Komie* (with consent)  
Stephen M. Komie  
Stephen M. Komie, Esq.  
Komie and Associates  
One N. LaSalle Street, Suite 4200  
Chicago, Illinois 60602  
(312) 263-2800